

**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Tobar S. Richardson (312) 469-6305

AUG 13 2018

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISIONTHOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

IVAN PARKER

CASE NUMBER:

**18CR 495****MAGISTRATE JUDGE VALDEZ****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about July 27, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*

Title 18, United States Code, Section  
1951(a)

*Offense Description*

by committing "robbery," which obstructed, delayed, and affected "commerce" and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, and committed and threatened physical violence to a person and property in furtherance of a plan, in violation of Title 18, United States Code, Section 1951;


This criminal complaint is based upon these facts:

X Continued on the attached sheet.

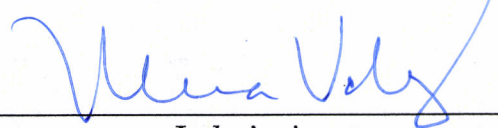
Sworn to before me and signed in my presence.

Date: August 13, 2018

City and state: Chicago, Illinois

  
DUSTIN T. GOURLEY

Special Agent, Federal Bureau of Investigation  
(FBI)

  
Judge's signature

MARIA VALDEZ, U.S. Magistrate Judge  
Printed name and Title

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

SS

**AFFIDAVIT**

I, DUSTIN T. GOURLEY, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since approximately 2012. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to violent crimes, including, among others, kidnaping, bank robbery, armed robberies of commercial institutions, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that Ivan Parker has violated Title 18, United States Code, Section 1951(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging IVAN PARKER with interfering with interstate commerce by robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. The statements in this affidavit are based on my personal knowledge, on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts, interviews, my review of surveillance images, and my experience and training as an FBI Special Agent.



**July 27, 2018 Robbery of Victim A**

4. On July 27, 2018, at approximately 6:59 a.m., an armed guard/ATM technician employed by Loomis Armored U.S. ("Victim A") was robbed at gunpoint by an unknown black male while servicing a Chase Bank ATM, located at 3856 West 26<sup>th</sup> Street, Chicago, Illinois. I am aware that Loomis Armored U.S. is an international business a variety of security services including armored truck transport and cash processing and operates in multiple states, including Illinois.

5. The FBI interviewed Victim A, who reported that he began work at approximately 5:20 a.m., which entailed picking up the armored vehicle along with a second employee, the driver. The armored vehicle was equipped with surveillance cameras. Victim A advised that the first stop of the day was to service the Chase Bank on West 26<sup>th</sup> Street. Victim A stated that the Chase Bank location had been serviced three times that week already, and July 27, 2018 would be the fourth time. The ATM vestibule inside the bank was equipped with video surveillance cameras.

6. Victim A recalled arriving at the Chase Bank at approximately 6:50 a.m., when he exited the armored vehicle and approached the vestibule within the Chase Bank where the ATM was located. Victim A explained that the Chase Bank was still closed, but access to the vestibule could be gained by scanning a credit/debit card.

7. Victim A gained access to the vestibule and viewed multiple customers inside the vestibule. Victim A recalled that one of the customers was a black male, approximately mid to late 20s/early 30s, approximately 6'0 - 6'2, thin build, wearing

a black baseball hat, black sunglasses, black jacket, black or camouflage pants, no gloves, and black gym shoes. Law enforcement later identified this person as PARKER. Victim A recalled that PARKER was at an ATM machine, which was located on the south side of the vestibule. Victim A explained that PARKER was utilizing a card at the ATM, but the ATM machine was making an error noise.

8. Victim A began servicing a machine, which was located on the northwest side of the vestibule. As part of his work, Victim A had with him a black bag that contained United States Currency. Once Victim A and PARKER were alone, PARKER approached Victim A. Victim A recalled PARKER stated words to the effect of "I don't want to hurt you, but," while pointing a black/dark blue handgun to Victim A's head. Victim A recalled attempting to push the gun away, and a physical struggle ensued. Victim A explained that PARKER used pepper spray on Victim A. PARKER then grabbed the black bag containing United States currency and departed the vestibule. According to Victim A, PARKER ran north bound on Springfield, then west bound in an alley.

9. Documents obtained from Loomis and Chase Bank show that the loss to the victim was approximately \$106,335.

10. Surveillance video from the armored vehicle depict PARKER running north bound on Springfield Avenue, and then westbound in the alley. A still image from the surveillance video included the following:





11. The FBI obtained numerous pieces of video surveillance footage from businesses and residents which depict PARKER in fact in an alley parallel to 26th Street, and later riding a bicycle towards Pulaski, and later on 25th Place. More footage showed PARKER on a bicycle near Ogden and Keeler, and eventually in the area of West Cermak.

12. Video footage depicted PARKER as he dismounted the bicycle and left it near a dumpster in the vicinity of an alley west of Kildare and north of Ogden. PARKER threw a black bag over a fence, and then jumped over the fence. PARKER picked up the bag and departed from view.

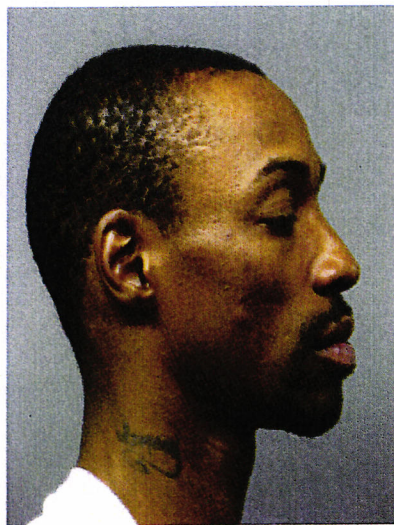
13. Surveillance footage from a location on West Cermak depicted PARKER walking towards an apartment building, wearing jeans, a white undershirt, black jacket, and carrying a black object in his left hand. The surveillance footage depicted PARKER entering an apartment building located at 4246 West Cermak Road, Chicago, Illinois at approximately 7:17 a.m.

**Identification of IVAN PARKER**

14. Based on witness interviews, FBI learned that the exterior door to 4246 West Cermak provides access to all of the apartments located at 4244 – 4250 West Cermak Road. The FBI interviewed Witness F, who was familiar with the residents living within the apartment complex. FBI showed Witness F a still image of video footage obtained during the investigation, and Witness F stated that the person depicted resembled IVAN PARKER. Additionally, law enforcement obtained a copy of PARKER's state identification, and law enforcement learned that PARKER lives at 4244 West Cermak, Unit 2ER.

15. I have viewed known photographs of PARKER who matches the general physical attributes of the person who robbed Victim A. More specifically, a booking photograph of PARKER taken as part of an arrest on June 16, 2017, shows a tattoo on his right neck area. The location of the tattoo is consistent with the location of a bandage on PARKER's neck during the robbery. Below is a comparison of the still image from the Chase Bank surveillance footage with a booking photograph of PARKER:





**Photo Array with Victim A**

16. On August 8, 2018, a sequential photographic array was conducted with Victim A. Victim A identified the photograph that depicted PARKER, but Victim A stated that he was not 100% sure in his selection.

**Search Warrant at 4244 West Cermak, Unit 2ER, Chicago, Illinois**

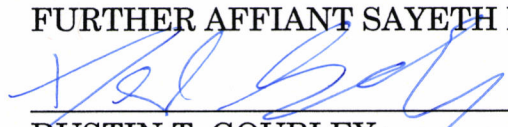
17. On August 10, 2018, the United States District Court for the Northern District of Illinois issued a search warrant for 4244 West Cermak, Unit 2ER, Chicago, Illinois.

18. During the execution of the search warrant, law enforcement found a number of items including: (a) a total of approximately \$7,010 in cash; (b) bank debit cards, including two Chase Bank cards; (c) a small canister of pepper spray and an unopened canister of pepper spray; and (d) items of jewelry purchased from Kay Jewelers including receipts.

**Conclusion**

19. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about July 27, 2018, IVAN PARKER, by committing a "robbery," which obstructed, delayed, and affected "commerce" and the movement of articles and commodities in commerce, as defined in Title 18, United States Code, Section 1951, in that the defendant, committed and threatened physical violence to a person and property in furtherance of a plan, in violation of Title 18, United States Code, Section 1951.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
DUSTIN T. GOURLEY

Special Agent, Federal Bureau of  
Investigation

SUBSCRIBED AND SWORN to before me on August 13, 2018.

  
\_\_\_\_\_  
MARIA VALDEZ

United States Magistrate Judge